

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:20-CR-478
	:	
Plaintiff,	:	
	:	JUDGE DAN AARON POLSTER
vs.	:	
	:	
TARA BRUNST,	:	<u>MOTION FOR PERMISSION TO</u>
	:	<u>TRAVEL</u>
Defendant,	:	
	:	

Defendant, by and through undersigned counsel, hereby requests this Honorable Court for permission to travel for an employment “National Leadership Meeting” in Charlotte, North Carolina. This meeting is for all the managers of Monro Muffler and Brake and their subsidiaries. As the Court is aware Mr. Brunst was hired as a regional manager and has been residing at a community correctional facility for approximately 5 months. She is managed to coordinate and work around a number of obstacles for her to keep this job and remain totally compliant with this Court’s and probations orders. Counsel has attached the documents provided by Monro for this meeting as well as her potential flight schedule (Exhibit A & B).

If granted permission, the Defendant would leave on December 11, 2022 at 12:36 p.m. and return to Cleveland on the afternoon of December 14, 2022 at 6:23 p.m. This Leadership meeting is critical to Ms. Brunst continuing to advance in the company and be granted greater responsibility and leadership in the company.

WHEREFORE, for the reasons set forth above, counsel would request this Honorable Court to grant her permission to travel out of state for this leadership conference/meeting.

Respectfully submitted,

/s/TIMOTHY J. KUCHARSKI
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CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2022 a copy of the foregoing Motion to Travel was electronically filed. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Timothy J. Kucharski
Timothy J. Kucharski [0062226]
Attorney for the Defendant